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REMARKS

Claims 1-18 are currently pending in the subject application and are presently under consideration. The specification and claims 6, 8, 9, 13, 14, and 18 have been amended herein to remedy minor informalities. No new matter was added. Marked up replacement paragraphs are at page 2, and all pending claims with status identifiers are at pages 3-8. Favorable consideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-18 Under 35 U.S.C. § 103(a)

Claims 1-18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Edel, *et al.* (US 4,891,771) in view of Truelson (US 6,223,191). It is respectfully submitted that this rejection should be withdrawn for at least the following reason. Edel, *et al.* and Truelson, individually or in combination, do not teach or suggest all the claim limitations of the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j).

In particular, and as will be discussed in detail below, neither Edel, *et al.* nor Truelson teach or suggest balancing a page of at least text *without forcing* any of the text onto a *previous page* or a *next page*, as recited in the subject claims.

Edel, *et al.* teaches balancing lines of text across columns *via* moving lines of text from a column(s) to another column(s) to provide a substantially similar number of lines of text across columns. (See Col. 3, lines 10-11, 15-17 and 25-28). Edel, *et al.* does not teach or suggest the recited limitations regarding balancing a page of at least text without forcing text onto a previous page or a next page. In contrast, Edel, *et al.* discloses that the selected columns can “span” multiple pages, wherein balancing can include *moving lines of text* from a column on a *first page* to a column on a *different page(s)*. (See Col. 3, lines 5-11 and 32-36). Thus, it is essential

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to Edel, *et al.* to force text onto a prior or a next page when the selected columns “span” multiple pages and include a dissimilar number of lines of text in order to provide columns with a substantially similar number of lines of text. Furthermore, the Examiner states that Edel, *et al.* does not teach or suggest “performing the balancing without forcing any text off the pages.” (See Office Action, page 2, ¶ 5).

Truelson fails to make up for the aforementioned deficiencies of Edel, *et al.* regarding balancing a page of at least text *without forcing* any of the text onto a *previous page* or a *next page*, as recited in the claimed invention. Instead, Truelson teaches formatting “groups of words” *via* determining the minimum number of lines for the group, and moving words within the group to provide a group that comprises the minimum number of lines with reduced hyphenation and letter spacing. (See Col. 2, Lines 38-47). In addition, Truelson teaches that a “word or portion of a word” from the group of words can be moved to a subsequent line. (See col. 2, lines 44-48). However, Truelson does not teach or suggest formatting the group of words, including the word or the portion of the word, *without forcing* text onto a previous page or a next page, as recited in the subject claims. Consequently, when a group of words spans pages and a last word or a portion of the last word on a page is moved to a subsequent line, it is moved to a *subsequent page*. Thus, it is imperative Truelson provide for *forcing* text onto a *next page*.

In view of the foregoing, it is respectfully submitted that the rejection of independent claims 1, 7, 9, 10, 14 and 15, and dependent claims 2-6, 8, 11-13, and 16-18, which respectively depend therefrom, be withdrawn.

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CONCLUSION

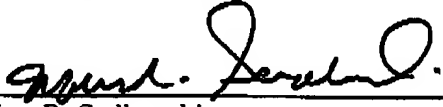
The present application is believed to be in condition for allowance, in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

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